

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

GERRIN LAPEYROUSE,

Plaintiff,

v.

SHELL OIL COMPANY, ET AL.,

Defendants.

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Civil Action No. 3:21-cv-00135

**AGREED MOTION FOR RULE 54(b) DESIGNATION AND
ENTRY OF FINAL JUDGMENT**

Defendant Helmerich & Payne Offshore, LLC (“H&P”), and Plaintiff Gerrin Lapeyrouse (together with H&P, the “Parties”) respectfully submit this Agreed Motion for Rule 54(b) Designation and Entry of Final Judgment, and request that the Court designate its May 4, 2022 Partial and Conditional Dismissal Order as to Helmerich & Payne Offshore, LLC (ECF No. 51), as a final judgment under Fed. R. Civ. P. 54(b) on an express determination that there is no just reason for delay. The Parties agree that entry of final judgment is justified under the present circumstances, as the Parties have executed a settlement agreement as to any and all of Plaintiff’s claims against H&P as related to this lawsuit or the events underlying this lawsuit. As such, there is no just cause to delay final judgment on the adjudicated rights and liabilities of H&P, and the Parties pray that the Court grant this Agreed Motion and enter final judgment dismissing H&P from this suit with prejudice.

Dated: August 24, 2022

Respectfully submitted,

BAKER & MCKENZIE LLP

By: /s/ M. Michelle Hartmann

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PLAINTIFF**

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that, on this **24th** day of **August**, 2022, a copy of the above and foregoing pleading was provided to all counsel of record via facsimile, hand delivery, electronic mail, U.S. mail, postage prepaid and properly addressed, and/or through the Court's CM/ECF system.

/s/ Taylor J. LeMay

Taylor J. LeMay